

IN THE UNITED STATES DISTRICT COURT
FOR THE STATE OF DELAWARE

ORIGINAL

Richard E. Shockley, Jr.
Plaintiff

06 126

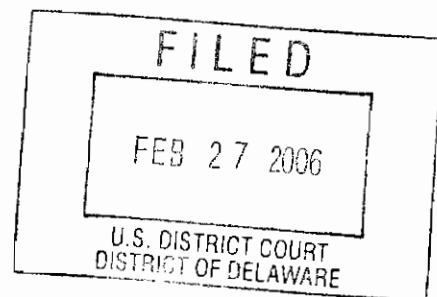
V.

Motion For Appointment
Of Counsel

Stanley Taylor, Thomas Carroll,
Lt. McCarty, Lt. Satterfield,
Sgt. Marvin Creasy, Sgt. Vangorder,
Officer Roger Raney, Officer Calhoun,
et al.

Civil Action No. _____

Defendants
individually and in their
official capacities,



Pursuant to 28 U.S.C. § 1915(e)(1), plaintiff
moves for an order appointing counsel to represent
him in this case. In support of this motion,
plaintiff states:

1. Plaintiff is unable to afford counsel. He has
requested leave to proceed in forma pauperis.
2. Plaintiff's imprisonment will greatly limit
his ability to litigate. The issues involved
in this case are complex, and will require
significant research and investigation.
Plaintiff has limited access to the law
library and limited knowledge of the law.

3. A trial in this case will likely involve conflicting testimony, and counsel would better enable plaintiff to present evidence and cross examine witnesses.

Wherefore, plaintiff requests that the court appoint counsel.

Richard E. Shockley, Jr.
Richard E. Shockley, Jr.
2/16/06

1181 Paddock Rd.
Smyrna, DE. 19977